

# Exhibit M

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
DEMOCRACY NORTH CAROLINA; )  
NORTH CAROLINA BLACK )  
ALLIANCE; LEAGUE OF WOMEN )  
VOTERS OF NORTH CAROLINA, )  
) )  
Plaintiffs, )  
) )  
vs. ) Civil Action No.  
) )  
ALAN HIRSCH, in his ) 1:23CV00878-TDS-JEP  
official capacity as CHAIR )  
OF THE STATE BOARD OF )  
ELECTIONS; JEFF CAMERON )  
III, in his official )  
capacity as SECRETARY OF )  
THE STATE BOARD OF )  
ELECTIONS; STACY EGGERS IV, )  
in his official capacity as )  
MEMBER OF THE STATE BOARD )  
OF ELECTIONS; KEVIN LEWIS, )  
in his official capacity as )  
MEMBER OF THE STATE BOARD )  
OF ELECTIONS; SIOBHAN )  
O'DUFFY MILLEN, in her )  
official capacity as MEMBER )  
OF THE STATE BOARD OF )  
ELECTIONS; KAREN BRINSON )  
BELL, in her official )  
capacity as EXECUTIVE )  
DIRECTOR OF THE STATE BOARD )  
OF ELECTIONS; NORTH )  
CAROLINA STATE BOARD OF )  
ELECTIONS, )  
) )  
Defendants. )  
DEPOSITION OF DEMOCRACY NORTH CAROLINA, BY AND  
THROUGH ITS 30(B)(6) DESIGNEE,  
CHERYL CARTER  
10:08 A.M.  
TUESDAY, MARCH 18, 2025

1 years, we engage around municipal elections,  
2 but that's not the only work we do. We also  
3 have -- one of our flagship programs is our  
4 Democracy Summer internship that is going  
5 into its 26th year. That is a program we do  
6 every summer, but it's not just a summer  
7 program. Those interns stay with us, engage  
8 with us throughout the year into the years  
9 when they become what we call Democracy  
10 Summer alumni.

11 So we do a variety of programs and  
12 campaigns that aren't just related to the  
13 election, but we will engage around the  
14 elections as well to inform, to educate, to  
15 ensure that people understand where they need  
16 to vote, what's on the ballot, and whatever  
17 information that they need to ensure that  
18 they can cast their ballot.

19 Q. Okay. So that's a great -- that's a great  
20 overview. Going to ask you a couple  
21 follow-up questions.

22 So I think I heard you say that you'd  
23 engage with -- Democracy NC engages with  
24 their community members; is that right?

25 A. Yes.

1 A. Yes, that's correct.

2 Q. Okay. So under the How We Do It bullet kind  
3 of towards the bottom middle of the page --  
4 do you see that?

5 A. Yes, I do.

6 Q. Under Educate it says you produce nonpoter --  
7 partisan voting guides for federal, state,  
8 and local election candidates; is that right?

9 A. Yes, that's correct.

10 Q. And do you guys still do that?

11 A. Yes, we do.

12 Q. Okay. What sort of things are going in these  
13 nonpartisan voter guides?

14 A. In the voter guides we have information from  
15 the candidates. Also, we're providing  
16 information about the current rules for that  
17 particular election cycle, giving tips to  
18 voters to ensure if there have been some new  
19 legislation, that we're educating around  
20 that. It talks about how to use early  
21 voting, the voter ID law, so anything that  
22 can help voters in making their plan to vote.

23 Q. Okay. And does it include information for  
24 who is on the ballot?

25 A. Yes, it does.

1 Q. Okay. So you produce these nonpartisan voter  
2 guides for every election; is that right?

3 A. Not every election. With -- in the odd years  
4 we may produce something that's smaller and  
5 sometimes we don't.

6 Q. Okay. But do you produce them for every  
7 even-numbered election?

8 A. I would say for the most part, yes, we do.

9 Q. And then under Educate, there is also --  
10 well, actually, in How We Do It, the third  
11 bullet down says, A statewide voter  
12 assistance hotline addressing voting issues  
13 in real time; is that right?

14 A. Yes.

15 Q. Okay. So what kind of issues are coming up  
16 in the voter assistance hotline?

17 A. A number of issues come up there. Sometimes  
18 it -- it may just be something pretty simple  
19 where a person's just asking basic -- basic  
20 questions. Sometimes it may be that a voter  
21 has tried to vote, they were unable to vote,  
22 so they're seeking assistance. Other times  
23 it may be something where there could be  
24 construction that's causing long lines at  
25 the -- at the voting location. So we get all

1 types of calls at -- through the hotline.

2 Q. Okay. And so the basic information you  
3 referenced earlier, is that something like,  
4 can you help me find my polling place, or  
5 some -- or, what are the hours of my polling  
6 place, something like that?

7 A. Yes.

8 Q. Okay. All right. Now we can move on.  
9 Mobilize under the How We Do It. So it says  
10 here that you guys partner with face-ba- --  
11 faith-based communities and other advocacy  
12 groups; is that right?

13 A. Yes, that's correct.

14 Q. All right. And we've talked about the other  
15 advocacy groups that Democracy NC partners  
16 with already; is that right?

17 A. Yes, that's correct.

18 Q. What sort of faith-based communities are you  
19 guys partnering with?

20 A. We partner with a number of faith-based  
21 communities, Baptist communities, AME Zion  
22 communities, just pretty much any faith-based  
23 organization that has similar beliefs and  
24 wants to ensure that we are removing the  
25 barriers to vote.

1 A. Yes, we are.

2 Q. Okay. And then the last bolded bullet here  
3 on this first page is, protect access to  
4 voting rights through bold action.

5 Do you see that?

6 A. On this first page?

7 Q. Yeah. The last bolded thing says, protect --

8 A. Oh, okay.

9 Q. Yeah.

10 A. Yes. Uh-huh.

11 Q. Okay. And then the very last bullet says,  
12 deploying poll volunteers; is that right?

13 A. Yes.

14 Q. Okay. And Democracy NC is not challenging  
15 any of the changes to poll monitors in 747 in  
16 this case; is that right?

17 A. Not to my knowledge, no.

18 Q. And so then the next page of this exhibit  
19 talks about all of the work that Democracy  
20 did -- NC did in 2020 at a high level; is  
21 that right?

22 A. Yes, that's correct.

23 MS. SPOTO: Object to form, but you can  
24 answer.

25 A. Yes, that's correct.

1 Q. And it says -- do you see sort of -- I think  
2 it's three-fourths of the way down the page a  
3 bullet that starts, We increased voter  
4 engagement and mobilization through our get  
5 out the vote program?

6 A. Yes, I do.

7 Q. Okay. And so is that get out the vote  
8 program the last week before the election  
9 that you were just talking about or do you  
10 think that means something else here?

11 A. It means more general that period of time so  
12 it's not just that last week. That can be  
13 the -- the -- the months leading up to the  
14 election as well.

15 Q. Okay. So here it seems like the document's  
16 using get out the vote -- the more expansive  
17 term that we --

18 A. Exactly.

19 Q. Okay.

20 A. Exactly.

21 Q. All right. And then it appears that on the  
22 last page it lists maybe some goals for 2021  
23 for Democracy NC; is that right?

24 A. Yes, that's correct.

25 Q. Okay. And it lists some goals for advancing



1 A. Yes.

2 Q. Okay. And then the in person on election day  
3 is 44 percent; is that right?

4 A. That's correct.

5 Q. Okay. So what sorts of programs does  
6 Democracy NC have targeted to this 18 to 25  
7 demographic that we've been talking about?

8 A. We've talked about our Democracy Summer  
9 program. That is our main program that's  
10 targeted at -- at that age group. There may  
11 be other programs, whether it's with our  
12 faith-based work, our nonprofit voter  
13 engagement work, the -- the voter protection  
14 program that we run. Any of our programs can  
15 be touching on that -- that age group and  
16 so -- and we also have what we call -- where  
17 our friendterns go back to school. They take  
18 the information -- and we call them  
19 friendterns instead of interns. That's just  
20 an -- anyway, and they take the information  
21 back and they may be eligible for a grant.  
22 We call that our Fund a Friendtern program.  
23 I'm trying to think of other programs we may  
24 run that's -- there was something that came  
25 into my mind and it slipped away so -- sorry

1           about that.

2           Q.    No.  That's fine.

3                        So you may have told me this earlier  
4           and, if you did, I'm sorry.  Approximately  
5           how many Democracy Summer internships do you  
6           guys give out every year?

7           A.    Anywhere from 20 to, I'd say, 22.

8           Q.    And I know that in order to be eligible to  
9           participate in the Democracy Summer program,  
10          you've got to attend a North Carolina  
11          university, college, or community college.  
12          You've got to be a North Carolina resident.

13                       What if you went to college a little  
14          later and you were 26, is there an age  
15          restriction on the program in addition to  
16          being in college or could you be in college  
17          and be 26 and participate in the program?

18          A.    There is not an age restriction.

19          Q.    Okay.  And then you talked about how when  
20          you're -- is it friendterns with a D --

21          A.    (Nods head).

22          Q.    Okay.  -- friendterns go back to their  
23          campuses --

24          A.    Uh-huh.

25          Q.    -- they might be eligible for a grant; is

1           that's correct.

2       Q.    Okay.

3       A.    Yes.

4       Q.    So it wouldn't be true that 18- to  
5           25-year-olds in 2020 utilized same-day  
6           registration at a higher rate?

7                   MS. SPOTO:  Objection to form.  You can  
8           answer to the extent you know.

9       A.    I wouldn't know their comparison to other  
10           voters because that's what we're talking --

11      Q.    Uh-huh.

12      A.    -- that they use it at a higher rate than  
13           other demographic of voters.

14      Q.    Okay.  And the voter turnout has not been  
15           published for 2024; is that right?

16      A.    That's correct.

17                   MS. SPOTO:  Objection to form.  You can  
18           answer.

19      A.    That's correct.

20      Q.    How has Democracy NC been harmed by the  
21           same-day registration change in 747?

22      A.    How we've been harmed.  As I referenced  
23           earlier, engaging in voter education, civic  
24           education, it takes considerable work because  
25           it's not always the person that you're

1 speaking directly to that you're  
2 disseminating that information to. You -- we  
3 may speak at a church. We may speak at a  
4 organization's gathering and what we're doing  
5 is educating the people in front of us with  
6 the thinking that they're then going to take  
7 it back to their networks, to their  
8 communities. So whenever there's a change --  
9 and especially in this situation, this is so  
10 technical and in the weeds that helping  
11 people to understand -- we have to strike a  
12 balance between arming them with the  
13 information so that they can be prepared with  
14 not scaring people so that they say, well, if  
15 it's that difficult, I'm just not going to  
16 bother to vote, because that's one thing we  
17 don't want to happen. We want to ensure that  
18 people are voting so giving them as much  
19 information as possible.

20 So those are ways. I would say another  
21 way is with our resources because, as you saw  
22 with the voter guides, with all the other  
23 resources, any time there's a change, we have  
24 to change our resources. And so that's a  
25 printing cost, that's a staff cost, personnel

1 because we have to review all of that  
2 information to ensure that we're being as  
3 accurate as possible.

4 So in all of those ways that Democracy  
5 NC can be impacted. And, as I mentioned, our  
6 organizing team, our policy team, our comms  
7 team, development team -- I mean, our whole  
8 staff has to have a basic understanding if  
9 they're not as much in the weeds as some of  
10 the experts on staff.

11 Q. Okay. But nothing in 747 prevented Democracy  
12 NC from advising North Carolina voters on how  
13 to use same-day registration; is that right?

14 MS. SPOTO: Objection to form. You can  
15 answer.

16 A. Can you say that again?

17 Q. Sure. Did anything in Senate Bill 747  
18 prevent Democracy NC from advising North  
19 Carolina voters on how to use same-day  
20 registration?

21 MS. SPOTO: And same objection.

22 MS. RIGGINS: What was wrong with the  
23 form on that?

24 MS. SPOTO: It's the -- it seemed  
25 confusing --

1 A. Educate.

2 Q. Okay. So let's try it this way: Did  
3 anything in Senate Bill 747 make it illegal  
4 for Democracy NC to educate North Carolina  
5 voters on how to use SDR?

6 A. I don't believe it made it illegal for us to  
7 educate. It made it harder for us to educate  
8 and it required more time. And whether we're  
9 talking about personnel time, the resource  
10 printing time, and ensuring that people had  
11 the information so that they could take it  
12 back to their communities as well.

13 Q. And the March -- would you agree with me that  
14 the March 2024 primary was the first year  
15 that Senate Bill 747 took effect?

16 A. I -- I'd say yes.

17 Q. Did Democracy NC still conduct its election  
18 protection hotline in 2024?

19 A. Yes, we did.

20 Q. Okay. Was -- in 2024, was Democracy NC still  
21 able to organize on college campuses?

22 A. Yes, we were.

23 Q. Okay. And would you agree with me that  
24 college students have a choice as to which  
25 address to cast their ballot for?